



PHMSA

Pipeline and Hazardous Materials  
Safety Administration



# **2008 SPRING PIPELINE SAFETY SEMINAR**

# *Contact Information*

*Wallace McGaughey*

*Pipeline Safety Specialist*

*U.S. Department of Transportation*

*PHMSA Office of Training and Qualifications*

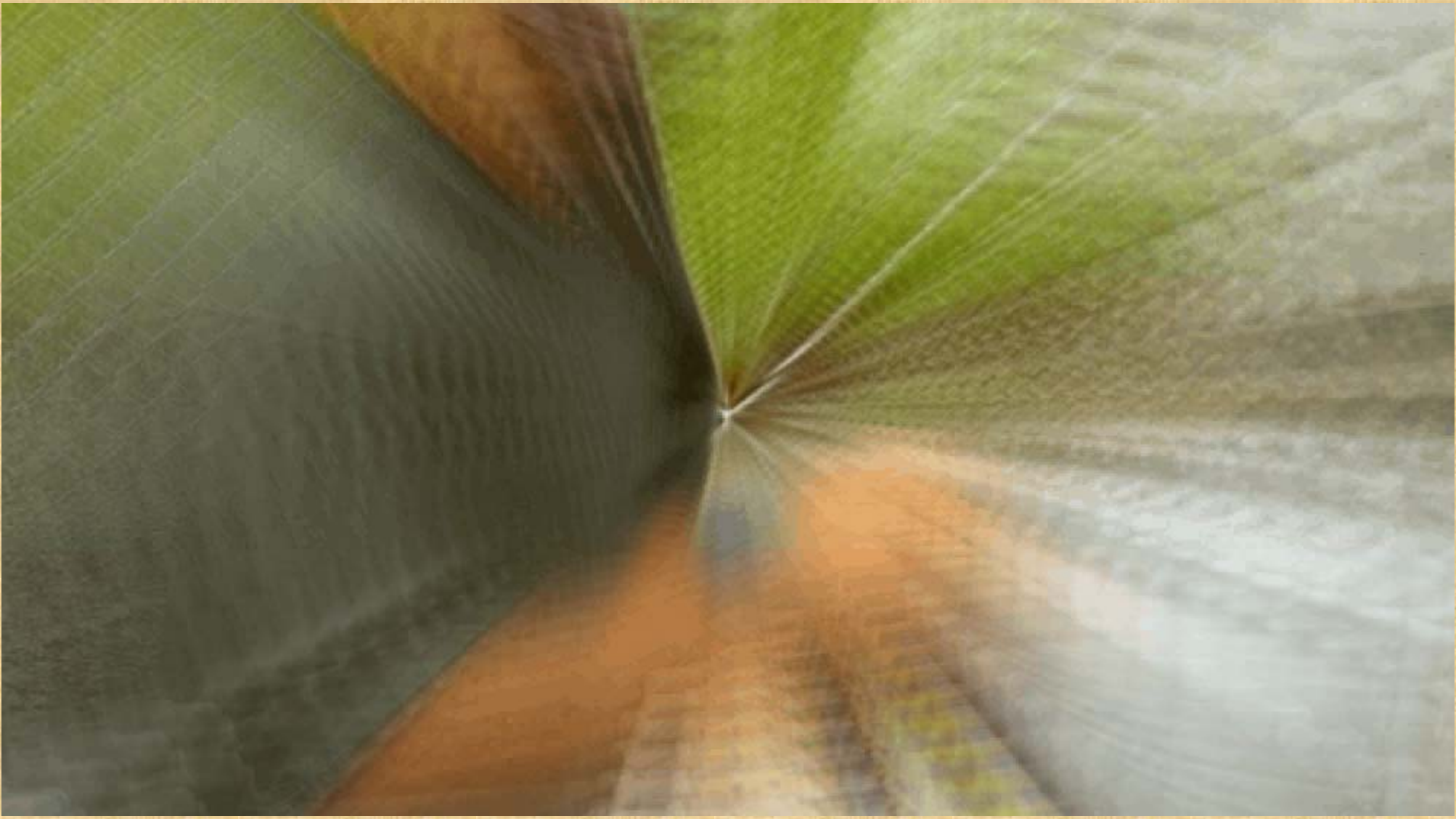
***Office (405) 954-6806***

***Cell (405) 397-4257***

***Email Wallace.Mcgaughey@dot.gov***



# Operator Qualification



**Focus on Safety**





# Operator Qualification Rule

***Amendment Number***

***195-67***

***Issued August 27, 1999***



# Operator Qualification Rule

## **PART 195**

### Subpart "G" Qualification of Pipeline Personnel **Section 500**

**501, 503, 505, 507, 509**



# Three PHASE

## First Phase

**Effective Date: Published  
in Federal Register  
October 26, 1999**



# Three PHASE

## Second Phase

**Effective Date: Operators  
Written Plan April 2001**





# Three phase

## Third Phase

**Effective Date: Operator  
Qualification of Individuals  
Performing Covered Tasks  
October 28, 2002**





# Operator Qualification Rule

## Understanding the Requirements of the O.Q. Rule



# Preamble to OQ Regulation

**Has the Operator reviewed the  
Preamble to the rule?**

- **Negotiated Rulemaking Process**
- **Qualification vs. Training/Certification**
- **Explanation/Analysis of Key Elements**
- **Persons Covered by the Rule**
- **Written Qualification Program**



# Preamble to OQ Regulation

**Does the Operator know which individuals are covered under the rule?**

- **Operator's Employees**
- **Contractors' Employees**
- **Subcontractors' Employees**
- **Other Entities Performing Covered Tasks**



# Section 195.501 Scope

**Does the Operator have a  
process in place to determine  
the qualification of individuals  
who perform covered tasks on  
a pipeline facility?**





## Section 195.2 Definitions

**Pipeline facility** means new and existing pipelines, rights-of-way, and any equipment, facility, or building used in the transportation of ( **name of product being transported** ).



# Sections 195.501 Scope

**Does the Operator have a  
process in place to identify  
covered tasks?**

**Specific tasks will vary  
among different operators,  
but many may be the same  
or similar.**



# Sections 195.501 Scope

**Does the Operator's process to identify covered tasks include the four-part test?**

- **Is Performed on a Pipeline Facility.**
- **Is an Operations or Maintenance Task.**
- **Is Performed as a Requirement of this Part.**
- **Affects the Operation or Integrity of the Pipeline .**



## Section 195.505 Qualification Program

**Does the Operator have  
a written Qualification  
Program?**

**Required By April 27, 2001**





## Section 195.505 Qualification Program

Is the Operator **following** the minimum requirements of the rule in the written Qualification Program?



## Section 195.505 Qualification Program

**Does the Operator's  
written Program include  
provisions for the  
following seven (7)  
required items?**



## Section 195.505 Qualification Program

**Provisions**, according to Webster, are stipulations or qualifications, especially clauses in a document or agreement.





# Section 195.505 Qualification Program

## 1. Provisions to identify covered tasks?





# Section 195.505 Qualification Program

**2. Provisions to ensure through evaluation that individuals performing covered tasks are qualified ?**



## Section 195.505 Qualification Program

**3. Provisions to allow individuals that are not qualified to perform a covered task under observation?**





## Section 195.505 Qualification Program

**4. Provisions** to evaluate an individual whose performance of a covered task may have contributed to a reportable incident (191.3) or accident (195.50)?



# Section 195.505 Qualification Program

**5. Provisions to evaluate whether an individual is no longer qualified to perform a covered task ?**





# Section 195.505 Qualification Program

**6. Provisions to communicate changes that affect covered tasks to individuals performing those tasks?**



# Section 195.505 Qualification Program

**7. Provisions** to identify those covered tasks and the intervals at which evaluation of the individual's qualification is needed ?





## Section 195.505 Qualification Program

**Does the Operator understand  
that the written program--**

**Is not required to be part of  
O&M manual; and**

**May be expanded without fear  
of penalty?**



## Section 195.503 Definitions

**Does the operator understand what is meant by “qualified” individual?**

**One who has been evaluated and can:**

- Perform covered tasks**
- Recognize/react to abnormal operating conditions**





## Section 195.503 Definitions

**Does the Operator have an “evaluation” process to determine an individual’s ability to perform a covered task?**



## Section 195.503 Definitions

**What evaluation methods  
has the Operator identified  
to assess an individual's  
ability to perform covered  
tasks?**



# Evaluation Methods

- written examination
- oral examination
- work performance  
history review
- observation
- other



## Section 195.503 Definitions

**Has the Operator identified**  
**“abnormal operating**  
**conditions”?**





## Section 195.503 Definitions

# Abnormal Operating Condition

- Malfunction of a Component, or
- Deviation from Normal Operations

→ Condition that may exceed design limits

→ Potential hazard to people / property / environment



## Section 195.503 Definitions

**Does evaluation of individuals include ability to recognize and react to abnormal operating conditions?**



# Preamble to OQ Regulation

**Does the Operator understand the  
evaluation requirements of the  
three qualification modes?**

- **Transitional**
- **Initial**
- **Subsequent**



## Section 195.509 General

**Is the Operator using  
“work performance history”  
as the sole evaluation  
method for individuals  
performing covered tasks  
prior to October 26, 1999**





## Section 195.509 General

**How is the Operator  
documenting and  
verifying “work  
performance history” as  
an evaluation criterion?**



## Section 195.509 General

**Did the Operator complete  
qualification of individuals  
performing covered tasks  
by**

**October 28, 2002?**



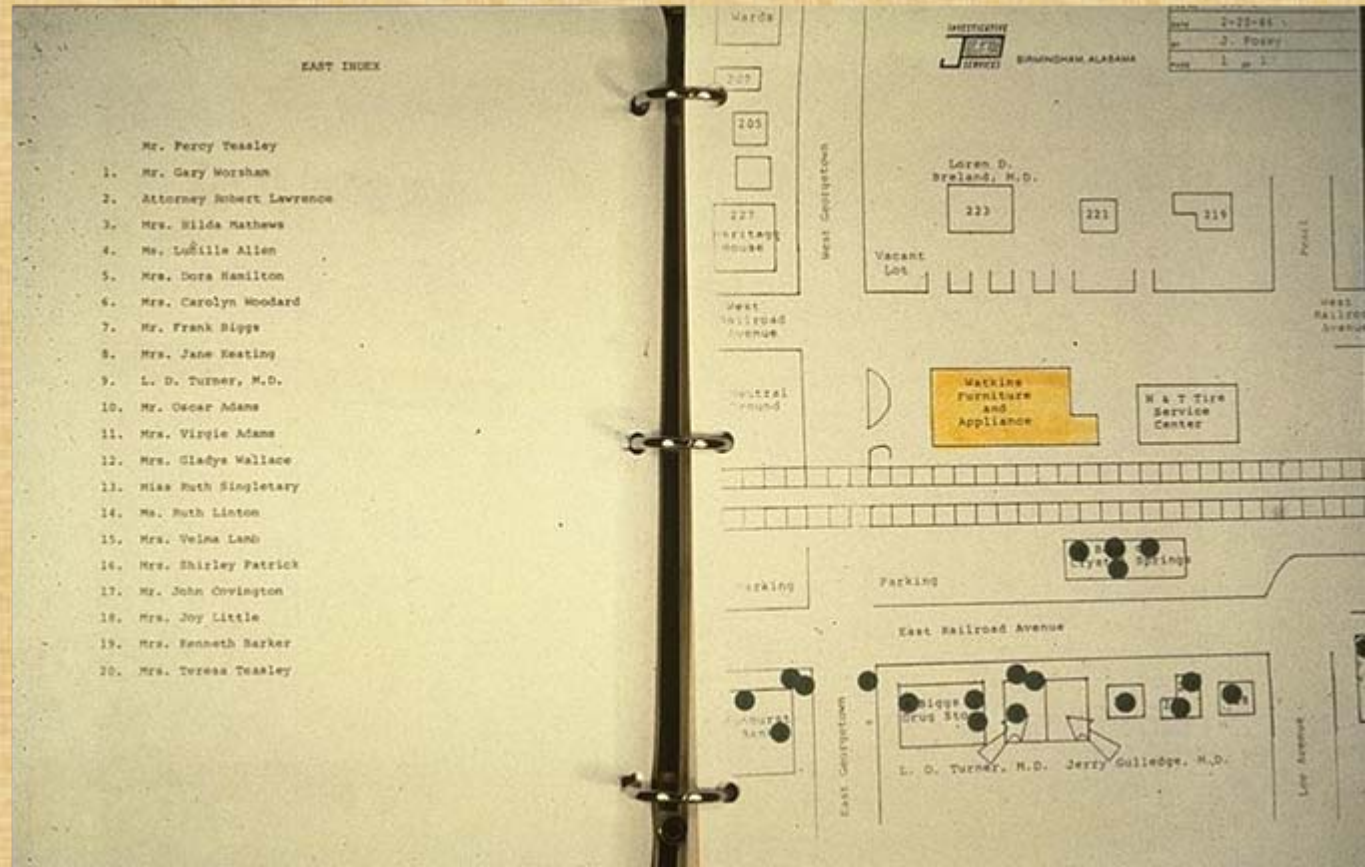
## Section 195.509 General

**Does the Operator  
understand that “work  
performance history” may  
not be the sole evaluation  
criterion after  
October 28, 2002?**





**Does the Operator have  
records that demonstrate  
compliance with this section?**



**Do the Operator's records include:**

- **I.D. of Qualified Individual(s)**
- **I.D. of Covered Tasks Individual is Qualified to Perform**
- **Date(s) of Current Qualification**
- **Qualification (evaluation) Methods**



## Section 195.507 Recordkeeping

**Does the Operator maintain qualification records **while** the individual is performing the covered task ?**





## Section 195.507 Recordkeeping

**Does the Operator know  
to maintain qualification  
records for five (5) years  
after individual stops  
performing the covered task  
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# OO Updates and Current Issues

## Excavation Advisory Bulletin

**ADB-06-01:** Notice to Operators of Natural Gas and Hazardous Liquid Pipelines to **Integrate Operator Qualification Regulations into Excavation Activities**



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# OQ Updates and Current Issues

## Excavation Advisory Bulletin

Issued to reinforce the need for *safe excavation practices and recommend that pipeline operators integrate OQ regulations into their marking, trenching and backfilling operations to prevent excavation damage mishaps*





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# OO Updates and Current Issues

- ADB 04-05 Testing and Training of personnel
  - An operator OO program must include a periodic requalification component that provides for examination or testing of individuals,
  - A program to provide training, as appropriate, to ensure that individuals performing covered tasks have the necessary knowledge and skills to perform the tasks in a manner that ensures the safe operation of pipeline facilities.



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## PHMSA OQ Forms

- Reference to the use of **Form 15 (OQ Protocol Element 9 – Field Verification)** was incorporated into Forms 1, 2, 3, 5, 7, 10 and 12)
- PHMSA forms have been updated and are accessible at:

<http://ops.dot.gov/library/forms/forms.htm>



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## **PHMSA OQ Forms**

- Recent advisory bulletins are accessible at:

**<http://ops.dot.gov/regs/advise.htm>**

